



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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Seattle, WA 98101-3140

SEP 30 2013

OFFICE OF
COMPLIANCE AND ENFORCEMENT

Reply to: OCE-127

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J. Wayne Maxie, R.G.
Manager, Environmental Projects
Agrium US, Inc.
4582 S Ulster Street Suite 1700
Denver, CO 80237-2641

Re: A-34 Lateral Assessment Work Plan Change in Groundwater Monitoring Frequency
Administrative Order on Consent for Nu-West Industries, Inc.
Idaho Facility, Docket No. RCRA-10-2009-0186

Dear Mr. Maxie:

As discussed on our conference call today, the groundwater monitoring frequency requirements in the A-34 Lateral Assessment Work Plan ("Work Plan") are modified as described below.

Section 5.3.1 of the Work Plan includes the following requirement:

In order to provide continuous monitoring of the water level and groundwater chemistry at A-34-022 during implementation of the proposed soil and groundwater investigations, Nu-West installed a pressure transducer and data loggers to monitor and record the water level, temperature, fluid conductivity, and pH during the week of December 17, 2012, and initial data have been provided to EPA and IDEQ. Nu-West will continue to download data weekly and provide to EPA and IDEQ for the duration of the proposed soil and groundwater investigation.

Weekly monitoring of the pH and conductivity is no longer required, and the two probes may be removed. Bi-weekly purging of the A-34-022 well and measurement of pH is required. Monthly monitoring and reporting of the water level, temperature, and pH is still required.

Section 5.3.2 of the Work Plan states that the groundwater monitoring program includes nine groundwater monitoring wells (A-27-090, A-27-135, A-34-022, A-35-080, A-35-155, A-36-105, A-36-145, MW-A-110, and MW-B-120) and production well NW-9. This section also specifies the groundwater monitoring schedule as weekly, bi-weekly, or monthly.

Groundwater sampling and monitoring of wells MW-A-110, MW-B-120, and production well NW-9 are no longer required.

Monthly groundwater sampling and monitoring of wells A-27-090, A-27-135, A-35-080, A-35-155,

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A-36-105, and A-36-145 are no longer required. EPA, Idaho DEQ, and Nu-West agreed that these monitoring wells are to be sampled quarterly in accordance with the Groundwater Monitoring Plan, which will supplant the monitoring requirements for these wells.

Weekly or bi-weekly groundwater sampling and monitoring of well A-34-022 is no longer required. EPA, Idaho DEQ, and Nu-West agreed that this monitoring well is to be sampled monthly and quarterly in accordance with the Groundwater Monitoring Plan, which will supplant the monitoring requirements for well A-34-022.

Thank you for your attention to this important matter.

Sincerely,



Peter Magolske
Air and RCRA Compliance Unit

cc: Brian Monson, Idaho Department of Environmental Quality
P. Scott Burton, Esq. Hunton and Williams LLP
Timothy J. Carlstedt, Esq. Hunton and Williams LLP

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J. Wayne Maxie, P.G.
Manager, Environmental Projects
Agrium US, Inc.
4582 S. Ulster Street, Suite 1700
Denver, CO 80237

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